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January 30, 2023

Via ECF

The Honorable Lorna G. Schofield  
United States District Judge  
United States District Court

**Re:** *Ashley Francis v. Ludlow Street Development, LLC and New York Cremeria, Inc.*

**Docket No. 1:22-cv-06578 (LGS)(RWL)**

Dear Judge Schofield:

We represent the plaintiff in the above-entitled action. Pursuant to paragraph 12(a) of the Civil Case Management Plan and Scheduling Order, the parties hereby provide a status letter as outlined in Your Honor's Individual Rule IV. A. 2.

**(a) What discovery has taken place, specifically**

**(1) What discovery requests have been propounded, who propounded each request and on what date,**

On December 29, 2022, plaintiff propounded a Request for Documents as well as a First Set of Interrogatories upon both defendants;

On January 9, 2023, defendant New York Cremeria, Inc. propounded a Request for Documents as well as a First Set of Interrogatories;

**(2) What responses were made, who made each response and on what date,**

Defendants have not responded to plaintiff's Interrogatories and Request for Documents and the time to do so has expired.

Plaintiff has not responded to defendants' discovery requests because the time to do so has not expired;

**(3) The volume of documents produced, who produce the documents and when;**

None

**(b) The procedural history of the case today, specifically**

**(1) What pleadings have been filed, who filed each pleading and on what date,**

Plaintiff filed the Complaint on August 2, 2022.

Defendants Ludlow Street Development, LLC filed an Answer to the complaint on September 30, 2022.

Defendant New York Cremeria, Inc. filed an Answer to the complaint on December 26, 2022.

**(2) What motions, if any, have been filed, who filed the motion and on what date each motion was filed,**

No motions have been filed to date; and

**(3) What motions, if any, are currently pending and, for each pending motion, the date it was or is scheduled to be fully briefed; and**

No motions are currently pending.

**(c) The parties' plans to ensure that they meet the Court ordered discovery deadlines.**

By February 7, 2023, Defendants will respond to plaintiff's Interrogatories and Request for Documents. The parties plan to respond to all outstanding discovery demands, plan for expert discovery, and conduct expert discovery.

Thank you for your time and attention to this matter. With kindest regards, I am

very truly yours,

/s/

Glen H. Parker, Esq.